

SOUTH CAROLINA EDUCATION OVERSIGHT COMMITTEE

Comments on the Preliminary South Carolina Submission Regarding *No Child Left Behind*

Approved on February 20, 2003

The Education Oversight Committee commends the Superintendent Tenenbaum and the staff at the State Department of Education (SDE) for the commitment to all children learning evidenced in the Preliminary Submission.

We offer these comments with the intent to strengthen South Carolina's proposal. The comments are divided into two sections: substantive issues and areas for technical clarification.

Substantive Issues

1. The EOC recommends serious consideration of annual targets rather than the three-year plateau system proposed in response to question 3.1. We believe that annual targets facilitate earlier identification of schools in need of support and ultimately improvement in academic services and results. We fear that the three-year plateau has the potential to delay action, resulting in subsequent growth expectations that overwhelm those responsible for the change in performance. We would appreciate an opportunity to review school performance data that support the plateau system over annual targets. We support the three-year averaging methodology and think this creates a safety zone against fluctuations attributable to extraordinary circumstances.
2. The EOC recommends that a target for student attendance be set that is higher than the baseline figure (anticipated to be 95.3 percent) outlined in response to questions 6.1 and 7.2. We further recommend an annual expectation for improvement. The methodology used to set the attendance target is the same methodology used to set the baseline (floor) performance for academic progress. The 95.3 percent set by the proposal reflects an average of 9 days absent per student in a school each year. We believe the target should expect more than the current baseline performance.

The EOC recommends that averaging of attendance data apply to a three-year period, rather than two, to be consistent with other averaging methodologies.

We are interested in data that demonstrate the number of days absent that are harmful academic performance and actions that could be promoted to improve attendance.

3. The EOC recommends annual targets for the graduation rate to stimulate changes in teaching and learning so that more students graduate each year. We also recommend that the three-year averaging methodology be used so that this calculation is consistent with other methodologies. This is addressed in the SDE response to question 7.1
4. The EOC recommends a review of the testing, reporting and decision-making time lines to maximize local school/district opportunities to review the data and appeal decisions and limit the number and inconsistencies in communications to parents. The proposed time line would require local school districts to notify parents twice during a single month to ensure choice. If a school was predicted but after review and appeal not determined to be in improvement status, would a parent's choice option be revoked?

The time line provides for an appeal, but only after public release of the data. The appeal process requires local districts to have the capacity, within a two-week window, to review the data quickly and effectively. How can the State support small districts or do they remain at a comparative disadvantage? These issues are addressed in the SDE response to question 1.4.

While the proposal may address immediate needs, we believe that a long-term solution must be initiated.

Areas for Technical Clarification

1.1 How does the State Accountability System include every public school and LEA in the State?

What are the AYP measures for the Governor's School for Science and Mathematics, the Governor's School for the Arts and Humanities, and the Wil Lou Gray School? Is the use of the SCRA with primary schools appropriate under the re structuring Section 59-18-330 and what measure would be used for students in grade two?

1.2 How are all public schools and LEAs held to the same criteria when making an AYP determination?

What is meant by "schools that have been reorganized?" Does this encompass changes in grade configuration, attendance zones or purpose or does reorganized mean converted to a charter school?

1.3 Does the State have, at a minimum, a definition of basic, proficient and advanced student achievement levels in reading/language arts and mathematics?

The document indicates that student performance standards are to be set on the field test of the High School Assessment Program. The time line would set standards before the test is reviewed by the EOC and, subject to recommended changes, approved. Is there a provision for change should the test not be approved?

1.4 How does the State provide accountability and adequate yearly progress decisions and information in a timely manner?

Which historical data are used and how is the prediction to be calculated?

1.5 Does the State Accountability System produce an annual State Report Card:

The narrative states that "achievement results will be disseminated as part of the report card prior to the beginning of the academic year" and the "rest of the information" by November 15. By achievement results, do you mean the disaggregated test scores and AYP status?

The EOC has translated sample report cards and support materials but does not have ongoing school-by-school translation services.

1.6 How does the State Accountability System include rewards and sanctions for public schools and LEAs?

The discussion of sanctions mentions a three-year commitment to technical assistance; however, with the exception of retraining grants, the state program does not guarantee services for three years. How does the progress from state identification to state takeover fit with the federal time line for improvement and intervention?

2.2 How does the State define "full academic year" for identifying students in AYP decisions?

Are we correct in assuming that only students enrolled in the State by the 45th day are included in the state numbers?

3.1 How does the State's definition of adequate yearly progress require all students to be proficient in reading/language arts and mathematics by the 2013-2014 academic year?

What is the relationship of the plateau system to technical assistance and budgeting for continuous improvement? Is the chart below correct?

Technical Assistance Eligibility

EAA Rating	Adequate Yearly Progress Title One Schools	Adequate Yearly Progress Non-Title One Schools
Excellent	If not met, yes	If not met, no
Good	If not met, yes	If not met, no
Average	If not met, yes	If not met, no
Below Average	If met or not met, yes	If met or not met, yes
Unsatisfactory	If met or not met, yes	If met or not met, yes

3.2 How does the State Accountability System determine whether each student subgroup, public school and LEA makes AYP?

The description of the calculation leaves some questions: What mean is referred to in the middle of the second paragraph for 3.2? Does the averaging provide an advantage to schools with declining performance?

What is meant by the second bullet under "Safe Harbor"? Is any amount of progress acceptable? Is averaging used in the Safe Harbor provision?

3.2a What is the State's starting point for calculating Adequate Yearly Progress:

The starting points are calculated across grades 3-8, resulting in a single ELA and a single math starting point or all grades. Since elementary school scores are higher than middle school scores, does this place middle schools at a relative disadvantage?

4.1 How does the State Accountability System make an annual determination of whether each public school and LEA made AYP?

The advantage of the "same subgroup" provision is that fewer schools are likely to be in need of technical assistance; however, this is very confusing for the public to understand. Does this make it difficult for districts to explain to parents which non-AYP schools offer choice and supplementary services and which do not?

5.2 How are public schools and LEAs held accountable for the progress of student subgroups in the determination of adequate yearly progress?

How does using 40 impact the number of schools meeting AYP? Does the SDE mean 40 in a subgroup as *enrolled* or as *tested*?

If the subgroup size of 40 is based on all grades *tested* in the school, the impact is very different from grades *enrolled*. *Tested* typically would involve three grade levels with PACT, but what about high schools, where only one grade level is tested (at least initially) with exit exam or HSAP?

5.3 How are students with disabilities included in the State's definition of adequate yearly progress?

How are modifications other than off level testing treated?

5.4 How are students with limited English proficiency included in the State's definition of adequate yearly progress?

While less than 1 percent of students are LEP statewide, the impact on some districts is much greater. Spanish language assessments are likely to be needed in Beaufort, Saluda, Greenville and Horry counties to obtain a clear understanding of student learning. Not having those assessments may presume those students do not have the knowledge or skills, just because they cannot read English.

Does the last sentence mean that "40" is not used at the district and State levels and that another subgroup size is used?

5.5 What is the State's definition of the minimum number of students in a subgroup required for reporting purposes? For accountability purposes?

What does the first bullet mean? In bullet 3, isn't every school in accountability? Does the author mean improvement status?

5.6 How does the State Accountability System protect the privacy of students when reporting results and when determining AYP?

Should the plan include language on how 100% of students would be reported? To ensure privacy should the phrase "more than 98 %" be used?

The third paragraph, beginning "Results of small groups" suggests a number different from the 40 specified earlier? What would be the procedure for specifying different subgroup numbers?

6.1 How is the State's definition of adequate yearly progress based primarily on academic assessments?

Should the targets for attendance and graduation rate be listed?

For schools with a multiple grade span, by majority of grades, does the author mean grades *enrolled* or grades *tested*? Does this create an automatic default to elementary schools if enrollment is used? If grades *tested* is used, how are K-8 schools treated and doesn't this preclude the high school ever being the unit of analysis?

9.1 How do AYP determinations meet the State's standard for acceptable reliability?

What does the last paragraph mean? Does the SDE have statistical data beyond those currently available that demonstrate decision consistency?

9.3 How has the State planned for incorporating into its definition of AYP anticipated changes in assessments?

As the state develops new forms or modifies current forms through cyclical reviews, is there a plan to ensure that the same performance demands are imposed on students and schools?

10.1 What is the State's method for calculating participation rates in the State assessments for use in AYP determinations?

By the "95 percent tested," we assume that the reference is to the 45th day enrollment. Is that correct?

What is meant by "single measure per subgroup?" Is that ELA or math or averaged across the two?

10.2 What is the state's policy for determining when the 95% assessed requirement should be applied?

Does the last sentence mean that 40 and 95 % tested are recommended for the EAA report card purposes (i.e., what is meant by "state procedures")? Does the SDE have impact data for review?